

**CAUSE NO. PD-1037-16**

**IN THE TEXAS COURT OF CRIMINAL APPEALS  
STATE OF TEXAS**

FILED  
COURT OF CRIMINAL APPEALS  
10/13/2017  
DEANA WILLIAMSON, CLERK

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**STATE OF TEXAS, Appellant**

**V.**

**REINALDO SANCHEZ, Appellee**

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**APPEAL OF TRIAL COURT CASE NO. 13-15-00288-CR  
FROM THE THIRTEENTH COURT OF APPEALS  
STATE OF TEXAS**

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**APPELLEE'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO FILE MOTION FOR REHEARING**

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State Bar Number: 08578900  
Attorney for Appellee**

Appellee / Respondent Reinaldo Sanchez, files this motion for extension of time to file a motion for rehearing in the above cause, and would show this court the following:

This court issued its decision on September 27, 2017.

Appellee's motion for rehearing would be due on this day, October 12, 2017. Appellee seeks a 20-day extension of time to file his motion for rehearing. If granted, said motion for rehearing will be due on November 1, 2017.

The Undersigned has not been able to timely file this motion for rehearing for the following reasons:

1. The Undersigned is set for jury trial on October 16, 2017, in a case styled, Cause No. F-5285-14-1, *In the Interest of Eduardo Cisneros*, a child in the Hidalgo County Court at Law No. One (1), Hidalgo County Courthouse, Edinburg, Texas, wherein the Undersigned serves as the appointed guardian ad litem for the child in this cause. A great deal of time is going into preparation for this trial.

2. On October 6, 2017, the Undersigned filed Appellee's brief in the case of *State v. Miguel Martinez*, appellate cause number 13-16-00659-CR, wherein the State appealed the Trial Court's grant of Appellee's motion to quash and motion to suppress.

3. On October 5-6, 2017, the Undersigned attended and gave a presentation at the two-day seminar, 2017 Multidisciplinary Advocacy Training

Conference on Child Abuse/Child Neglect “Moving Forward Towards Healing and Prevention.” Many hours went into said presentation.

4. The Undersigned is focusing much attention the case of *USA v. Guillermo Cardenas-Sanchez*, cause number 17-CR-00908. Although this case was re-set to the end of November, much time is going into discovery, investigation, and visiting with the Defendant who is incarcerated in the Willacy County Detention Facility.

5. On October 10, 2017, the Undersigned has due, appellant’s brief in the case of *Rita Alejandro v. Efrain Alejandro*, appellate cause number 13-17-00014-CV.

6. The Appellant had a brief due in the case of *State v. Paez*, appellate cause number 13-16-00429-CR on October 2, 2017. A motion for extension of time was filed but has not yet been ruled on by the Thirteenth Court of Appeals.

7. On October 26, 2017, the Undersigned is set for oral argument in the case of *State v. Adames*, cause number 13-15-00569-CR in the Thirteenth Court of Appeals of Texas.

As a result of the foregoing, Appellee seeks a 20-day motion for extension of time to file his motion for rehearing.

This is Appellee's first motion for extension of time to file his motion for rehearing. This motion for a 20-day extension is sought not to unnecessarily delay this case but so that justice can be done.

WHEREFORE, Appellee prays that this Court grant this motion for extension of time to file his motion for rehearing. If granted, Appellee's motion for rehearing will be due on November 1, 2017.

Respectfully submitted,

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By: /s/ Victoria Guerra  
Victoria Guerra  
Appellate Attorney for Appellee  
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### **CERTIFICATE OF SERVICE**

On this day, the foregoing document was delivered to Appellant's counsel Michael Morris via email: [Michael.Morris@da.co.hidalgo.tx.us](mailto:Michael.Morris@da.co.hidalgo.tx.us) and the State Prosecuting Attorney, Lisa McMinn via email: [Lisa.McMinn@SPA.texas.gov](mailto:Lisa.McMinn@SPA.texas.gov)

SIGNED this 12th day of October, 2017.

/s/ Victoria Guerra  
Victoria Guerra

### **CERTIFICATE OF CONFERENCE**

On the 12th day of October, 2017, the Undersigned conferred with Hidalgo County Assistant District Appellate Attorney Michael Morris, who stated that the State has no objection to the Court granting this motion.

/s/ Victoria Guerra  
Victoria Guerra

### **CERTIFICATE OF COMPLIANCE**

In compliance with TRAP 9.4(i)(3), the undersigned certifies that the number of words in this motion , excluding those matters listed in Rule 9.4(i)(1), is 448.

SIGNED this 12th day of October, 2017.

/s/ Victoria Guerra  
Victoria Guerra